Susan,

Thank you for providing the your April 15, 2014 memorandum summarizing your field observations from the April 11, 2014 and April 15, 2014 site visits to the Possum Point Power Station. We wanted to provide additional information relative to Ash Ponds A, B, C to ensure you have the most up to date information about the ponds.

First, based on a review of historical permit related documents there is a history of this area being addressed and in agency and Dominion documents. Two examples are provided below:

Stormwater requirements were first included in the permit for Possum Point in 1996. As a result, the storm water pollution prevention plan dated March 14, 1996 contains the following description of storm water Outfall S104.

VA# S104

Outfall and Drop Inlets (pipes) and [manholes]: VA# S104 < (103) (102)

Outfall Location: Latitude 38° 32' 34", Longitude 77° 16' 45"

Description: Outfall VA# S104 is a 30" concrete pipe which is integral to an inactive decant structure that previously served Ash Ponds A, B, and C. The drainage area associated with VA# S104 is approximately 43.8 acres with 50% cleared, 10%, highway, 25% medium woods, and 15% brush. Three drainage areas contribute runoff to this outfall:

1. A small drainage area (two acres) located on the northwest side of the intersection of Possum Point Road and Cockpit Point Road contributes runoff to VA# S104 via pipe #102. This area consists of 5% cleared, 30% highway, and 65% medium woods.

2. Approximately 16.9 acres just northwest of area 1 above, and bounded to the southwest by Possum Point Road, contributes runoff to VA# S104 via pipe #103. This area contains approximately 5% cleared, 5% highway, 35% brush, and 55% medium woods.

3. Approximately 25 acres (43.8 acres total minus 16.9 acres #103 and 2 acres #102) located west of drainage areas 1 and 2 above across Possum Point Road. It is within this drainage area that the old Ash Ponds A, B, and C were located.

Potential Contaminants: None

The plan clearly identifies the location of the old ponds but concludes no potential for contaminants due to nature of drainage area that time.

The permit application submitted in 2006 provides the same description of the outfall and associated drainage area similar to the description above.

Another example is the VPDES permit reissued effective October 24, 2007. In Table 3 of the Fact Sheet developed by DEQ to support the permit contains a list of stormwater outfalls and drainage area descriptions that include S104.

Over time the coverage of this area has evolved in our SWPPP as the stormwater requirements and our understanding has evolved and we would be happy to discuss this further with you. In the current SWPPP this area is described as sheet flow to reflect the determination that as vegetation has grown over the area that the stormwater discharge is not associated with industrial activity.

In addition, some clarification is needed on the time frames various ponds were used. Based on the construction date for pond D, we believe that ash was placed in pond D around 1966. The original ash pond D is shown on USGS maps in 1966 and show ash pond D constructed. Based on this construction date, we believe that ash ponds A, B and C were no longer active. Ash pond D was later expanded in 1988.

Any thing to add on seeps
Acreage of the ponds, volume

We would be happy to discuss any of this information further with you. Please contact me at (804) 273-2929 with your questions.

Engineering Responses to Report

First Paragraph- The ash pond complex was constructed in approximately 1955 and was last used no later than 1965. The original Ash Pond D was constructed and put into service before 1966, but the exact date is unknown. The ash pond complex A, B, & C was designed as a contiguous area with the decant structure located in Ash Pond C.

Summary of Field Observations

2nd Bullet -The quantity of ash deposited in the ash pond complex is approximately 170,000 cu yds.
3rd Bullet -The acreage of the ash pond complex is approximately 12 acres.
4th Bullet -Dominion will be submitting to DCR the appropriate application to register the impoundment. DCR requirements for registration will be submitted by Dominion.
9th Bullet – There is moisture in discrete locations along the toe of the berm, but not along the entire length. This not a structural concern since there is no evidence of seepage up the berm surface indicating a compromise of the berm and therefore a dam safety issue.
11th Bullet – The breach area is not new and is estimated to be older than a couple of years. This estimate is based on the extent of vegetation and the limited erosive force of the low water flow. Observed water flow following several rain events has confirmed that erosion is not significant even

though flow is increased during the event. There is no evidence of seepage and the flow is totally from surface drainage.

12th Bullet – The flow observed at the southeastern edge adjacent to the closed sewage treatment lagoon is not seepage through the berm. The topography of the surrounding area directs stormwater around the outside perimeter of the berm.

14th Bullet – The reconstructed Ash Pond D was put into service in 1988.